

Danielle E. Karst (D.C. Bar No. 481881)  
Timothy J. Mulreany (Maryland Bar No. 8812160123)  
**COMMODITY FUTURES TRADING COMMISSION**  
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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

COMMODITY FUTURES TRADING  
COMMISSION,

Plaintiff,

v.

DAVID GILBERT SAFFRON  
a/k/a DAVID GILBERT and  
CIRCLE SOCIETY, CORP.,

Defendants.

Case No. 2:19-cv-1697-JAD-DJA

**APPLICATION FOR ENTRY OF DEFAULT  
AGAINST DEFENDANT DAVID GILBERT  
SAFFRON A/K/A DAVID GILBERT**

**TO THE CLERK OF THE ABOVE-TITLED COURT:**

Plaintiff, Commodity Futures Trading Commission, respectfully requests that the Clerk enter default in this action pursuant to Federal Rule of Civil Procedure 55(a) against David Gilbert Saffron aka David Gilbert (“Defendant Saffron”), on grounds that Defendant Saffron was duly served with the Summons and Complaint in this action but has failed to plead within the time prescribed by the Federal Rules of Civil Procedure. *See* Declaration of Danielle E. Karst in support of Plaintiff’s Application for Entry of Default Against Defendant Saffron, submitted herewith.

1 Dated: December 21, 2019

Respectfully submitted,

2 By: /s/ Danielle E. Karst

Danielle E. Karst

3 Timothy J. Mulreany

**COMMODITY FUTURES TRADING**

**COMMISSION**

4 Three Lafayette Centre

5 1155 21st Street, N.W.

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**CERTIFICATE OF SERVICE**

On December 21, 2019, I served a copy of *Plaintiff's Application for Entry of Default Against Defendant David Gilbert Saffron a/k/a David Gilbert and Declaration of Danielle Karst in Support of the Application* with the Clerk of the Court using the CM/ECF system. I also certify that on December 21, 2019, I sent hard copies of the same to Defendants Saffron and Circle Society, Corp. via United Parcel Service overnight mail and electronic mail at the following addresses:

**David Gilbert Saffron**

[REDACTED]  
Las Vegas, Nevada [REDACTED]  
davidsaffron@live.com  
(Last-Known Address known by CFTC)

**Circle Society, Corp.**

c/o David Saffron or Marc Jenson  
2450 St. Rose Parkway, Suite 120  
Henderson, NV 89074  
Mjenson1960@gmail.com  
davidsaffron@live.com

(Last-Known Addresses provided by former defense counsel, ECF No. 32, and ordered on the docket by the Court, ECF No. 34)

/s/Danielle E. Karst

Danielle E. Karst